

EXHIBIT C

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

VICTOR ELIAS PHOTOGRAPHY,
LLC, An Oregon Limited Liability
Company,

Plaintiff,

v.

MARRIOTT INTERNATIONAL,
INC., LEONARDO WORLDWIDE
CORPORATION, A Canadian
Corporation, ICE PORTAL, A Florida
Corporation, and JOHN DOE,

Defendants.

C.A. NO. 4:18-cv-02142

**DECLARATION OF BANCROFT S. GORDON IN
SUPPORT OF DEFENDANTS' MOTION TO DISMISS
PLAINTIFF'S AMENDED COMPLAINT**

I, Bancroft S. Gordon, declare, pursuant to 28 U.S.C. § 1746, that:

1. I am the Corporate Secretary for Marriott International, Inc.
("Marriott International"). The information provided in this declaration is based on my personal knowledge, as well as on a review of the corporate records of Marriott International. If called as a witness, I would testify competently to the facts stated herein.
2. Marriott International is a corporation organized under the laws of Delaware.

3. Marriott International's principal place of business and corporate headquarters is in Bethesda, Maryland.

4. Marriott International and its subsidiaries or affiliates currently operate, franchise, or license more than 6,700 properties worldwide in 130 countries and territories. Marriott International's business is focused on managing hotels and franchising or licensing hotels owned by third-party owners, so Marriott International owns very few lodging properties. As of November 16, 2018, Marriott International and its subsidiaries or affiliates own only fifteen hotels worldwide, none of which are in Texas.

5. As of November 16, 2018, there are four hundred eighty-seven Marriott-branded properties open in Texas. Marriott International does not own any of those four hundred eighty-seven properties.

6. Most of the Marriott-branded properties in Texas (390) are franchise hotels owned and operated by independent third-parties under franchise agreements with Marriott International.

7. Marriott International manages only one hotel in Texas: the Houston Marriott Medical Center/Museum District hotel, located at 6580 Fannin Street, Houston, Texas 77030. The hotel is owned by a third-party and managed under a management agreement between the owner and Marriott International.

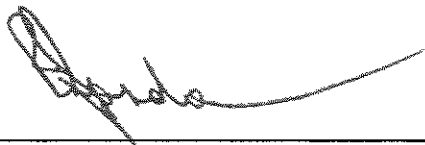
8. The Courtyard South University Drive Forth Worth hotel, located at 3150 Riverfront Drive, Fort Worth, Texas 76107, is a leased hotel. The tenant, CTYD III Corporation, a subsidiary of Marriott International, leases the hotel from a third-party owner/landlord. Neither Marriott International nor its subsidiaries or affiliates lease any other hotels in Texas; in total, Marriott International and its subsidiaries or affiliates lease forty-eight hotels worldwide.

9. The remaining Marriott-branded properties in Texas are owned and operated by third-parties under franchise agreements with subsidiaries or affiliates of Marriott International (thirty-seven properties) or are owned by a third-parties and managed by subsidiaries or affiliates of Marriott International under management agreements between those parties (fifty-eight properties).

10. None of Marriott International's subsidiaries or affiliates that lease, manage, or franchise hotels in Texas are incorporated in Texas or have their principal place of business in Texas.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: November 16, 2018



Bancroft S. Gordon